

ELECTRONIC PERMIT SUBMITTAL SYSTEM

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County: CONTRA COSTA AFS Plant ID: 06-013-
Facility: GENERAL CHEMICAL CORPORATION

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June 6, 1997

Mr. Peter Hess
Deputy Air Pollution Control Officer
Bay Area Air Quality Management District
939 Ellis Street
San Francisco, CA 94109

Dear Mr. Hess:

We have completed our review of Bay Area Air Quality Management District's May 1, 1997 submittal of ten re-proposed Title V permits. The purpose of this letter is to identify any issues with the proposed permits which were not identified in EPA's May 30, 1997 letter. The enclosed comments address additional periodic monitoring issues, EPA's source-specific comments from our January 31, 1997 comment letter, and any comments arising from conditions in the May 1 proposed permits that were not included in the original proposal.

Based on the time left in our review period, we are not requesting that the enclosed comments be addressed prior to June 13, 1997, however, we do ask that the comments be addressed prior to permit issuance. We will contact Bay Area before June 13 to discuss and answer any questions regarding the enclosed comments. Because the first permits issued by a permitting authority undergo detailed EPA review, it has been our experience that significant issues are raised at this time. However, we believe that the time and effort that Bay Area has put into these proposed permits is well spent, because we have been able to work together to resolve many issues that will also apply to permits proposed in the future. If you have any questions, please contact me at (415) 744-1254, or Martha Larson of my staff at (415) 744-1170.

Sincerely,

Matt Haber
Chief, Permits Office

enclosures

cc: Janet Stromberg, Bay Area Air Quality Management District
Ray Menebroker, California Air Resources Board
Rodney M. Helfrich, U.S. Pipe and Foundry
Thomas Brafford, General Chemical
Benjamin Zamora, Acme Fiberglass
Kurt Haunschild, East Bay MUD
James Chen, Union Sanitary
James Parker, Fleischmann's Yeast
Helen Farnham, City of Sunnyvale
Alan Bahl, Universal Foods
Scott Stinebaugh, City of Santa Rosa
Michael Lewis, Western Fiberglass

Enclosure 1
EPA Review of May 1, 1997 Title V Permit Submittal

1. Periodic Monitoring. a) In Bay Area's response to EPA's January 31 comment letter, Bay Area stated that

"The District has agreed to add sufficient monitoring to the draft permits, but is reluctant to anticipate the final requirements in 40 CFR 64. In order to avoid future difficulties, we have decided to impose additional monitoring only in those cases where a source has large emissions and existing federally enforceable emission limits."

As discussed in our May 30 letter, CAM will not address or supersede the periodic monitoring requirements. Both Bay Area's rules and part 70 require that periodic monitoring be considered for each applicable requirement, regardless of size. While size of emissions are one factor in determining appropriate periodic monitoring, size alone does not determine the probability that the unit will continuously operate in compliance with its emission limits.

Under the "Monitoring Requirement Citation" column of the "Applicable Emission Limits and Compliance Monitoring Requirements" tables, there are still a large number of applicable requirements for which "none," meaning no monitoring, is entered. Prior to issuing the proposed permits, we request that Bay Area provide for these applicable requirements either a demonstration that additional monitoring is unnecessary to assure compliance, a demonstration that existing permit conditions assure compliance, or permit conditions for each applicable requirement sufficient to yield information to assure compliance.

b) Of the specific applicable requirements not identified in EPA's May 30 letter, four SIP rules account for the majority of the remaining applicable requirements for which periodic monitoring is not addressed: SIP rules 6-301 (opacity), 6-310 (TSP limits), 9-1-302 (SO₂ emission limits), and rule 9-1-304 (fuel sulfur content limits). All ten proposed permits contain one or more of these requirements, and these requirements are often applicable to multiple units at each source. To assist you in deciding how to address these requirements, we discuss monitoring options for these rules in the following paragraphs.

SIP rule 6-301 is a broadly applicable opacity limit. Where monitoring is necessary, reference Methods 9 and 22 are both acceptable. Where well-maintained units are unlikely to have any visible emissions, a condition triggering maintenance if visible emissions are observed is an option. A better option would be to require periodic unit maintenance to insure that visible emissions will not occur. Whether the source is performing a periodic test or doing periodic maintenance, records of the results should be kept. Examples of opacity monitoring permit conditions are included in enclosure 2.

SIP rule 6-310 imposes a TSP emission limit of 0.15 grains per dscf on exhaust gas volume. Testing may be used to demonstrate compliance. Surrogates for testing would include monitoring of operating parameters, periodic maintenance requirements, or

opacity monitoring. Where there is control equipment associated with the emissions unit, monitoring of the control equipment could be substituted where proper operation of the control equipment would insure compliance. An example of monitoring for good operation of a baghouse is included in enclosure 3.

SIP rule 9-1-302 sets sulfur dioxide limits of 300 ppm. Compliance with this limit may be ensured in some cases by limiting fuel sulfur content. A demonstration based on fuel sulfur content, combined with a fuel sulfur limit and a requirement to demonstrate compliance with the limit could be used in place of source testing. An example demonstration based on low fuel sulfur content is included in enclosure 4.

SIP rule 9-1-304 sets a limit on fuel sulfur content. A relatively straightforward means of demonstrating compliance is to require that the source keep records of supplier certification. If this is not possible, the source may periodically test the fuel sulfur content. A sample permit condition is included in enclosure 5.

c) In addition to the applicable requirements listed above and those identified in the May 30 letter, the following sources have applicable requirements for which there is no monitoring:

Red Star Yeast

No monitoring for S-1 or S-2 for Conditions 1993 part 1

Fleischmann's Yeast

No monitoring for S-2 Conditions 260 parts 1 and 2

No monitoring for S-3 Condition 14319 part 1

General Chemical Corporation

No monitoring for S-14 Regulation 8-7-301.2, or Condition 708 part 1

No monitoring for S-15 Condition 7606 parts 3 and 4

No monitoring for S-17 Condition #12051 part 2

City of Sunnyvale

No monitoring For S-14 and 15, Condition 10844, part 1

No monitoring for S-110, -120, -130, -140, -150, -161, or -170 for Regulation 8-2-301

Union Sanitary

No monitoring for S-43, Condition 9238 part 2

No monitoring for S-100, -110, -111, -120, -130, -135, -140, -150, -160, -161, -162, -163, -164, -170 for Regulation 8-2-301

No monitoring for S-101 for Regulation 8-7-301.2

East Bay MUD

No monitoring for Units S-43, -44, -45, -46, and -47 for Regulation 8-2-301

No monitoring for Unit S-48 for Regulation 8-7-301.2

No monitoring for Units S-110, -120, -130, -140, -150, -160, -170, -180 for Regulation 8-2-301 or Condition 7293, part 1

City of Santa Rosa

No monitoring for Units S-17, -18, -100, -110, -120, -130, -140, -150, -160, -170, -180, -190 for Regulation 8-2-301

2. Schedules of Compliance. Bay Area added a compliance schedule to each permit in order to address our General Comment I.1.f. This is consistent with the District's Manual of Procedures, Volume II, Part 3, Section 4.5. Since there are applicable requirements found in other parts of the permit in addition to Parts III and IV, the language of the schedule of compliance should be modified to read "...The permit holder shall continue to comply with all applicable requirements ~~cited in Parts III and IV~~ of this permit. The permit holder shall also comply with applicable requirements that become effective during the term of this permit."

3. NSPS Applicability -- Flares. Sources combusting landfill gas may need to meet the requirements of the applicable NSPS standard. Bay Area should determine whether the landfill supplying gas to the City of Sunnyvale is subject to the NSPS, and if so, whether the units combusting the gas should have permit conditions consistent with NSPS requirements. If flares are combusting the landfill gas, and meet the applicability requirements, they may also be subject to the flare requirements of 40 CFR §60.18.

4. Alternative Monitoring. Several permits allow the source to propose, at a future date, alternative monitoring, which would be approved by the District using the permit modification procedures in Regulation 2, Rule 6. Based on this language, it is our understanding that, under Regulation 2-6-226, any significant change or relaxation to these monitoring requirements would be considered a significant permit modification.

5. City of Sunnyvale. The source added two engine generators to its facility. Conditions for these generators are listed in Section VI. Permit Conditions, condition 10844. Permit condition A.2 establishes a rolling twelve consecutive month electrical production limit for the reciprocating engines. The District should indicate that the need for a long term rolling limit has been demonstrated by the source. In addition, A.2 should state that the production limit is calculated on a monthly basis. Also, permit condition A.3 indicates that the monthly combined electricity generated by the reciprocating engines shall be maintained in a District approved log for at least 24 months from the date of entry. The condition should be revised to require maintenance of the records for 5 years from the date of entry.

6. Typos and Minor Corrections

a. U.S. Pipe and Foundry

1. In Section VII, please define monitoring frequency "W" as used in Table VII-F.

b. Fleischmann's Yeast

1. Table VII-B, Steam Boiler S-2 The District stated in the Facility Evaluations write-up that the monitoring frequency for SO₂ emission compliance has been added to Table VI-B for Steam Boiler S-2. However, this table has been renumbered as Table VII-B in the revision of the proposed permit, and there is no monitoring requirement in the table for SO₂ emission compliance.
2. There is a typo in the test methods table -- a change made for condition #206, part 3 reads instead #260, part 3.

c. Western Fiberglass

1. Typo -- the permit needs to include applicable requirement 8-50-301.3 in the emission limit table as stated in the response to comments.

d. General Chemical Corporation

1. Section II, "Equipment list" identifies S-30 and S-31 as sulfuric acid tanks # 4 and #7, respectively. Under Section IV, "Source-specific applicable requirements," Table IV-C, S-30 and S-31 are identified as sulfuric acid tanks #3 and #4, respectively. Please clarify.
2. On pages 6 and 7, the equipment list heading should be II, not I.

e. Acme Fiberglass

1. Typo -- the date cited for SIP Regulation 6, "Particulate Matter and Visible Emissions" should be 9/2/81.

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Sincerely,

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Chief, Permits Office

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SURNAME

DATE

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